

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

May 1, 2012

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23

Dear Sir/Madame:

We are writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into our response to the proposed pilot, we want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like ours) to obtain affordable telecommunications and internet access.

Freshwater Education district is a consortium of 13 rural school districts in Minnesota. Many of them are in high poverty areas. Without the E-Rate program our schools would not be able to afford many of the technology options that are available and necessary. Our schools depend on E-Rate to cover the costs of telecommunications and internet access.

The pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds, it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing/administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

We are concerned that operating the pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. **Specifically, we oppose the proposal to operate/administer the proposed pilot through the E-Rate program.**

E-Rate is oversubscribed and underfunded, and to divert resources (whether fiscal or administrative) away from the program before it fulfills its stated goals is premature/shortsighted

Thank you for considering our response as you move forward with your decision on the Digital Literacy Pilot. We applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. We urge you to take similar protective measures when it comes to the implementation and administration of the pilot; please ensure that critical, limited E-Rate resources—both fiscal and administrative—are protected.

Sincerely,



Tonia Judd

E-Rate Division

Freshwater Education District

Cc: Congressman Collin C. Peterson
 Congressman Chip Cravaack
 Senator Al Franken
 Senator Amy Klobuchar